

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Speed RMG Partners, LLC, Robby
Gordon, and Todd Romano,

Case No. 20-CV-00609 NEB/LIB

Plaintiffs,

**DEFENDANTS' MOTION FOR A
PROTECTIVE ORDER TO
PRECLUDE THE DEPOSITION
OF SCOTT DONNELLY**

v.

Arctic Cat Sales Inc., Arctic Cat Inc.,
Textron Specialized Vehicles Inc., and
Textron Inc.,

Defendants.

TO: Plaintiffs Speed RMG Partners, LLC, Robby Gordon and Todd Romano
and their counsel of record.

PLEASE TAKE NOTICE that Defendants Arctic Cat Sales Inc., Arctic Cat
Inc., Textron Specialized Vehicles Inc. ("Arctic Cat Parties"), and Textron Inc.
move this Court pursuant to Rule 26(c) of the Federal Rules of Civil Procedure
for a Protective Order to Preclude the Deposition of Scott Donnelly.

First, good cause exists for the issuance of a protective order because Mr.
Donnelly has no unique knowledge of the information sought by Plaintiffs Speed
RMG Partners, LLC, Robby Gordon, and Todd Romano ("Speed Partners"), as is
required for the depositions of high-level corporate executives under the apex
doctrine.

Second, good cause independently exists for the issuance of a protective
order because Speed Partners have not exhausted other less intrusive ways to

obtain the same information they now seek from Mr. Donnelly, as is required for the depositions of high-level corporate executives under the apex doctrine.

This Motion is based upon the records and filings in this case, including the Memorandum of Law in Support of the Motion for a Protective Order to Preclude the Deposition of Scott Donnelly, the Declaration of John Collins, the Declaration of Daniel A. Haws, and the supporting exhibits filed therewith.

Dated: January 28, 2021

HKM, P.A.

s/ Daniel A. Haws

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